

Alison D. Bauer
William F. Gray, Jr.
Jiun-Wen Bob Teoh
FOLEY HOAG LLP
1301 Avenue of the Americas
25th Floor
New York, New York 10019
Tel: (646) 927-5500
Fax: (646) 927-5599

James Fullmer
Meredith S. Parkinson
Michael Licker
FOLEY HOAG LLP
Seaport West
155 Seaport Boulevard
Boston, Massachusetts 02210
Tel: 617.832.1197
Fax: 617.832.7000

*Attorneys for Jeffrey Lew Liddle and Liddle & Robinson, L.L.P.,
each a Debtor and Debtor-in-Possession*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re
LIDDLE & ROBINSON, L.L.P.,¹
Debtor

X
: Chapter 11
:
: Case No. 19-12346 (SHL)
:
: Jointly Administered with 19-10747 (SHL)
:
X

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re
JEFFREW LEW LIDDLE,
Debtor

X
: Chapter 11
:
: Case No. 19-10747(SHL)
:
: Jointly Administered with 19-12346 (SHL)
:
X

**NOTICE OF AGENDA FOR MATTERS SCHEDULED FOR HEARING ON
DECEMBER 19, 2019 AT 11:00 A.M.**

Time and Date of Hearing: December 19, 2019 at 11:00 a.m. (EST)

¹ The last four digits of Liddle & Robinson, L.L.P.'s taxpayer identification number are 6440.

Location of Hearing: United States Bankruptcy Court for the Southern District of New York, before the Honorable Sean H. Lane, United States Bankruptcy Judge, **Room 701**, One Bowling Green, New York, New York 10004

PLEASE TAKE NOTICE that an agenda with respect to all matters set for hearing on **December 19, 2019 at 11:00 a.m. (EST)** is set forth below. Copies of each pleading identified below can be viewed and/or obtained by: (i) accessing the Court's website at www.nysb.uscourts.gov, or (ii) contacting the Office of the Clerk of Court at One Bowling Green, New York, New York 10004. Note that a PACER password is required to access documents on the Court's website.

AGENDA

I. CASE STATUS UPDATE

II. DEBTOR LIDDLE & ROBINSON, L.L.P.'S CONTESTED MATTERS

A. Motion by Counsel Financial II LLC, LIG Capital LLC, and Counsel Financial Holdings LLC, to Convert this Chapter 11 Reorganization to a Chapter 7 Liquidation [**19-12346 ECF No. 103**]

1. Related Documents:

(i) Omnibus Objection by Debtor Liddle & Robinson, L.L.P. to (A) Motion of Counsel Financial II LLC, LIG Capital LLC, and Counsel Financial Holdings LLC Pursuant to § 1112(b) of the Bankruptcy Code, to Convert This Chapter 11 Reorganization to a Chapter 7 Liquidation (the CF Firm Motion); (B) the Motion by Blaine H. Bortnick Pursuant to § 1112(b) of the Bankruptcy Code, to Convert This Chapter 11 Reorganization to a Chapter 7 Liquidation (the Bortnick Motion) and (C) United States Trustees Motion: (I) Pursuant to 11 U.S.C. § 1112, for Conversion of the Chapter 11 Case of Liddle & Robinson L.L.P. to a Case under Chapter 7 of the Code, or (II) In the Alternative, Pursuant to 11 U.S.C. § 1104, for Appointment of a Chapter 11 Trustee [**19-12346 ECF No. 163**]

- i. Memorandum of Law in Support of Omnibus Objection by Debtor Liddle & Robinson, L.L.P. [**19-12346 ECF No. 163-1**]
- ii. Affidavit of Jeffrey Lew Liddle in Opposition to the Conversion Motions [**19-12346 ECF No. 163-2**]
- iii. Declaration of Allen Willen in Support of Omnibus Objection by Debtor Liddle & Robinson, L.L.P. and Objection by Debtor Jeffrey Lew Liddle [**19-12346 ECF No. 163-3**]

- (ii) Reply by Counsel Financial II LLC, LIG Capital LLC, and Counsel Financial Holdings LLC in Further Support of Their Motions to Convert Debtors' Chapter 11 Reorganizations to Chapter 7 Liquidations **[19-12346 ECF No. 173]**
 - i. Declaration of David H. Wander in Further Support of Motion by Counsel Financial II LLC, LIG Capital LLC, and Counsel Financial Holdings LLC Pursuant to § 1121(b) of the Bankruptcy Code, to Convert this Chapter 11 Reorganization to a Chapter 7 Liquidation **[19-12346 ECF No. 174]**
 - ii. Declaration of Megan Payne in Further Support of Motions by Counsel Financial II LLC, LIG Capital LLC, and Counsel Financial Holdings LLC Pursuant to § 1121(b) of the Bankruptcy Code, to Convert these Chapter 11 Reorganizations to Chapter 7 Liquidations **[19-12346 ECF No. 175]**
 - iii. Declaration of Richard Silverstein in Connection with Motions by Counsel Financial Entities to Convert Debtors' Chapter 11 Reorganizations to Chapter 7 Liquidations **[19-12346 ECF No. 176]**
 - iv. Declaration of Ronald J. Soluri, Jr., CPA in Further Support of Motions by Counsel Financial II LLC, LIG Capital LLC, and Counsel Financial Holdings LLC Pursuant to § 1121(b) of the Bankruptcy Code, to Convert these Chapter 11 Reorganizations to Chapter 7 Liquidations **[19-12346 ECF No. 177]**
 - v. Declaration of Glenn Philips in Further Support of Motion by Counsel Financial II LLC, LIG Capital LLC, and Counsel Financial Holdings LLC Pursuant to § 1121(b) of the Bankruptcy Code, to Convert this Chapter 11 Reorganization to a Chapter 7 Liquidation **[19-12346 ECF No. 179]**
 - vi. Declaration of Larry Hutcher in Further Support of Motion by Counsel Financial II LLC, LIG Capital LLC, and Counsel Financial Holdings LLC Pursuant to § 1121(b) of the Bankruptcy Code, to Convert these Chapter 11 Reorganizations to Chapter 7 Liquidations **[19-12346 ECF No. 178]**

2. Status: Going forward with respect to Liddle & Robinson, L.L.P.

B. Motion by Blaine H. Bortnick to Convert this Chapter 11 Reorganization to a Chapter 7 Liquidation [19-12346 ECF No. 130]

1. **Related Documents:**

- (i) Omnibus Objection by Debtor Liddle & Robinson, L.L.P. to (A) Motion of Counsel Financial II LLC, LIG Capital LLC, and Counsel Financial Holdings LLC Pursuant to § 1112(b) of the Bankruptcy Code, to Convert This Chapter 11 Reorganization to a Chapter 7 Liquidation (the CF Firm Motion); (B) the Motion by Blaine H. Bortnick Pursuant to § 1112(b) of the Bankruptcy Code, to Convert This Chapter 11 Reorganization to a Chapter 7 Liquidation (the Bortnick Motion) and (C) United States Trustees Motion: (I) Pursuant to 11 U.S.C. § 1112, for Conversion of the Chapter 11 Case of Liddle & Robinson L.L.P. to a Case under Chapter 7 of the Code, or (II) In the Alternative, Pursuant to 11 U.S.C. § 1104, for Appointment of a Chapter 11 Trustee [19-12346 ECF No. 163]
 - i. Memorandum of Law in Support of Omnibus Objection by Debtor Liddle & Robinson, L.L.P. [19-12346 ECF No. 163-1]
 - ii. Affidavit of Jeffrey Lew Liddle in Opposition to the Conversion Motions [19-12346 ECF No. 163-2]
 - iii. Declaration of Allen Willen in Support of Omnibus Objection by Debtor Liddle & Robinson, L.L.P. and Objection by Debtor Jeffrey Lew Liddle [19-12346 ECF No. 163-3]
- (ii) Reply by Blaine H. Bortnick to Debtor's Opposition to Motion Pursuant to Section 1112(b) of the Bankruptcy Code, to Convert this Chapter 11 Reorganization to a Chapter 7 Liquidation [19-12346 ECF No. 172]

2. **Status:** Going forward with respect to Liddle & Robinson, L.L.P.

C. Motion by United States Trustee to Convert this Chapter 11 Reorganization to a Chapter 7 Liquidation [19-12346 ECF No. 155]; [19-10747 ECF No. 257]

1. **Related Documents:**

- (i) Omnibus Objection by Debtor Liddle & Robinson, L.L.P. to (A) Motion of Counsel Financial II LLC, LIG Capital LLC, and Counsel Financial Holdings LLC Pursuant to § 1112(b) of the Bankruptcy Code, to Convert This Chapter 11 Reorganization to a Chapter 7 Liquidation (the CF Firm Motion); (B) the Motion by Blaine H.

Bortnick Pursuant to § 1112(b) of the Bankruptcy Code, to Convert This Chapter 11 Reorganization to a Chapter 7 Liquidation (the Bortnick Motion) and (C) United States Trustees Motion: (I) Pursuant to 11 U.S.C. § 1112, for Conversion of the Chapter 11 Case of Liddle & Robinson L.L.P. to a Case under Chapter 7 of the Code, or (II) In the Alternative, Pursuant to 11 U.S.C. § 1104, for Appointment of a Chapter 11 Trustee [19-12346 ECF No. 163]

- i. Memorandum of Law in Support of Omnibus Objection by Debtor Liddle & Robinson, L.L.P. [19-12346 ECF No. 163-1]
- ii. Affidavit of Jeffrey Lew Liddle in Opposition to the Conversion Motions [19-12346 ECF No. 163-2]
- iii. Declaration of Allen Willen in Support of Omnibus Objection by Debtor Liddle & Robinson, L.L.P. and Objection by Debtor Jeffrey Lew Liddle [19-12346 ECF No. 163-3]

2. Status: Going forward with respect to Liddle & Robinson, L.L.P.

D. Debtor's Motion for Entry of Interim and Final Orders Pursuant to 11 U.S.C. §§ 105, 361, 362, 363 and 507, Rules 2002, 4001 and 9014 of the Federal Rules of Bankruptcy Procedure (1) Authorizing Use of Cash Collateral, (2) Granting Adequate Protection, (3) Modifying the Automatic Stay, and (4) Scheduling a Final Hearing [19-12346 ECF No. 5]

1. Related Documents:

- (i) Debtor's Notice of Revised Budget for use of cash collateral with respect to Debtor's Motion for Entry of Interim and Final Orders Pursuant to 11 U.S.C. §§ 105, 361, 362, 363 And 507, Rules 2002, 4001, and 9014 of the Federal Rules of Bankruptcy Procedure (1) Authorizing Use of Cash Collateral, (2) Granting Adequate Protection, (3) Modifying the Automatic Stay, and (4) Scheduling a Final Hearing [19-12346 ECF No. 23]
- (ii) Objection to Motion by Debtor to (i) Extend Deadline to File Schedules, (ii) Use Cash Collateral, (iii) Retain Professionals, and (iv) Implement Procedures for Interim Compensation (related document(s) 3, 4, 5, 6, 7, 8, 9, 10) [19-12346 ECF No. 25]
- (iii) Interim Order (1) Authorizing Use of Cash Collateral, (2) Granting Adequate Protection, (3) Modifying the Automatic Stay, and (4) Scheduling a Final Hearing [19-12346 ECF No. 30]

- (iv) Second Interim Order (1) Authorizing Use of Cash Collateral by Liddle & Robinson, LLP, (2) Granting Adequate Protection, (3) Modifying the Automatic Stay, and (4) Scheduling a Final Hearing **[19-12346 ECF No. 46]**
- (v) Third Interim Order (1) Authorizing Use of Cash Collateral by Liddle & Robinson, LLP, (2) Granting Adequate Protection, (3) Modifying the Automatic Stay, and (4) Scheduling a Final Hearing **[19-12346 ECF No. 81]**
- (vi) Fourth Interim Order (1) Authorizing Use of Cash Collateral by Liddle & Robinson, LLP, (2) Granting Adequate Protection, (3) Modifying the Automatic Stay, and (4) Scheduling a Final Hearing **[19-12346 ECF No. 108]**
- (vii) Fifth Interim Order (1) Authorizing Use of Cash Collateral by Liddle & Robinson, LLP, (2) Granting Adequate Protection, (3) Modifying the Automatic Stay, and (4) Scheduling a Final Hearing **[19-12346 ECF No. 157]**
- (viii) Proposed Sixth Interim Order (1) Authorizing Use of Cash Collateral by Liddle & Robinson, LLP, (2) Granting Adequate Protection, (3) Modifying the Automatic Stay, and (4) Scheduling a Final Hearing **[19-12346 ECF No. 169]**
 - i. Informal objection to use of cash collateral by Counsel Financial

2. **Status:** Going forward on an interim basis with respect to Liddle & Robinson, LLP.

E. Debtor's Motion for Entry of an Order Extending the Debtor's Exclusive Period to File a Chapter 11 Plan and Solicit Acceptances Thereof Pursuant to Section 1121 of the Bankruptcy Code **[19-12346 ECF No. 124]**

1. **Related Documents:**

- (i) Objection by Counsel Financial II, LLC, LIG Capital, LLC, and Counsel Financial Holdings, LLC to Debtor's Motion for Entry of an Order Extending Debtor's Exclusive Period to File a Chapter 11 Plan and Solicit Acceptances Thereof Pursuant to Section 1121 of the Bankruptcy Code **[19-12346 ECF No. 136]**
- (ii) Motion by Counsel Financial II, LLC, LIG Capital, LLC, and Counsel Financial Holdings, LLC to File Under Seal **[19-12346 ECF No. 137]**

- (iii) Debtor's Opposition to Motion by Counsel Financial II, LLC, LIG Capital LLC, and Counsel Financial Holdings LLC to File Under Seal [19-12346 ECF No. 141]
- (iv) Order Signed on 12/6/2019 Extending the Debtor's Exclusive Periods to File a Chapter 11 Plan and Solicit Acceptances Thereof [19-12346 ECF No. 156]
- (v) Notice of Proposed Order Extending the Debtor's Exclusive Period to File a Chapter 11 Plan and Solicit Acceptances Thereof Pursuant to Section 1121 of the Bankruptcy Code [19-12346 ECF No. 170]

2. **Status:** Going forward with respect to Liddle & Robinson, L.L.P.

F. First Application of The Benefit Practice for Interim Allowance of Compensation for Services Rendered and Reimbursement of Expenses Incurred as Benefits Consultant to the Debtor and Debtor-in-Possession for the Period from May 9, 2019 through November 21, 2019 [19-12346 ECF No. 153]

1. **Related Documents:**

- (i) Notice of Monthly Statement of The Benefit Practice for Compensation for Services Rendered and Reimbursement of Expenses Incurred as Benefits Consultant to the Debtor and Debtor-in-Possession for the Period from May 9, 2019 through November 21, 2019 [19-12346 ECF No. 140]
- (ii) Objection by Counsel Financial Holdings, LLC, Counsel Financial II, LLC, and LIG Capital, LLC to Notice of Monthly Statement of The Benefit Practice for Compensation for Services Rendered and Reimbursement of Expenses Incurred as Benefits Consultant to the Debtor and Debtor-in-Possession for the Period from May 9, 2019 through November 21, 2019 [19-12346 ECF No. 150]
- (iii) Objection by Counsel Financial Holdings, LLC, Counsel Financial II, LLC, and LIG Capital, LLC to First Application of The Benefit Practice for Interim Allowance of Compensation as Benefits Consultant to the Debtor [19-12346 ECF No. 160]

2. **Status:** Going forward with respect to Liddle & Robinson, L.L.P.

G. First Application of EisnerAmper LLP for Interim Allowance of Compensation for Services Rendered and Reimbursement of Expenses Incurred as Accountants to the Debtor and Debtor-in-Possession for the Period from July 22, 2019 through October 31, 2019 [19-12346 ECF No. 154]

1. **Related Documents:**

- (i) Notice of Monthly Statement of EisnerAmper LLP for Compensation for Services Rendered and Reimbursement of Expenses Incurred as Accountants to the Debtor and Debtor-in-Possession for the Period from July 22, 2019 through August 31, 2019 **[19-12346 ECF No. 85]**
- (ii) Notice of Monthly Statement of EisnerAmper LLP for Compensation for Services Rendered and Reimbursement of Expenses Incurred as Accountants to the Debtor and Debtor-in-Possession for the Period from September 1, 2019 through September 30, 2019 **[19-12346 ECF No. 107]**
- (iii) Notice of Monthly Statement of EisnerAmper LLP for Compensation for services rendered and reimbursement of expenses incurred as accountants to the Debtor and Debtor in Possession for the period from October 1, 2019 through October 31, 2019 **[19-12346 ECF No. 131]**
- (iv) Objection by Counsel Financial Holdings, LLC, Counsel Financial II, LLC, and LIG Capital, LLC to Notice of Monthly Statement of EisnerAmper LLP for Compensation for services rendered and reimbursement of expenses incurred as accountants to the Debtor and Debtor in Possession for the Period from July 22, 2019 through August 31, 2019 **[19-12346 ECF No. 95]**
- (v) Objection by Counsel Financial Holdings, LLC, Counsel Financial II, LLC, and LIG Capital, LLC to Notice of Monthly Statement of EisnerAmper LLP for Compensation for services rendered and reimbursement of expenses incurred as accountants to the Debtor and Debtor in Possession for the period from October 1, 2019 through October 31, 2019 **[19-12346 ECF No. 151]**
- (vi) Objection by Counsel Financial Holdings, LLC, Counsel Financial II, LLC, and LIG Capital, LLC to First Application of EisnerAmper LLP **[19-12346 ECF No. 160]**

2. **Status:** Going forward with respect to Liddle & Robinson, L.L.P.

H. First Application of Foley Hoag LLP for Interim Allowance of Compensation for Services Rendered and Reimbursement of Expenses Incurred as Counsel to the Debtor and Debtor-in-Possession for the Period from July 22, 2019 through October 31, 2019 **[19-12346 ECF No. 152]**

1. **Related Documents:**

- (i) Notice of Monthly Statement of Foley Hoag LLP for Compensation for Services Rendered and Reimbursement of Expenses Incurred as

Counsel to the Debtor and Debtor in Possession for the Period from July 22, 2019 Through July 31, 2019 [19-12346 ECF No. 118]

- (ii) Notice of Monthly Statement of Foley Hoag LLP for Compensation for Services Rendered and Reimbursement of Expenses Incurred as Counsel to the Debtor and Debtor in Possession for the Period from August 1, 2019 Through August 31, 2019 [19-12346 ECF No. 119]
- (iii) Notice of Monthly Statement of Foley Hoag LLP for Compensation for Services Rendered and Reimbursement of Expenses Incurred as Counsel to the Debtor and Debtor-in-Possession for the Period September 1, 2019 through September 30, 2019 [19-12346 ECF No. 134]
- (iv) Notice of Monthly Statement of Foley Hoag LLP for Compensation for Services Rendered and Reimbursement of Expenses Incurred as Counsel to the Debtor and Debtor-in-Possession for the Period October 1, 2019 through October 31, 2019 [19-12346 ECF No. 135]
- (v) Objection by Counsel Financial Holdings, LLC, Counsel Financial II, LLC, and LIG Capital, LLC to Notices of Monthly Statements [19-12346 ECF No. 128]
- (vi) Objection by Counsel Financial Holdings, LLC, Counsel Financial II, LLC, and LIG Capital, LLC to First Application of Foley Hoag LLP for Interim Allowance of Compensation as Counsel to the Debtor [19-12346 ECF No. 160]

2. **Status:** Going forward with respect to Liddle & Robinson, L.L.P.

I. Motion By Blaine H. Bortnick Pursuant to Rule 2004 and Section 105(a) of the Bankruptcy Code, for an Order Directing Jeffrey L. Liddle and Liddle & Robinson L.L.P. to Produce Documents and for Related Relief [19-12346 ECF No. 129]

1. **Related Documents:**

- (i) Objection by Debtor Liddle & Robinson, L.L.P. to Motion By Blaine H. Bortnick Pursuant to Rule 2004 and Section 105(a) of the Bankruptcy Code, for an Order Directing Jeffrey L. Liddle and Liddle & Robinson L.L.P. to Produce Documents and for Related Relief [19-12346 ECF No. 162]

2. **Status:** Going forward with respect to Liddle & Robinson, L.L.P.

III. DEBTOR JEFFREY LEW LIDDLE'S CONTESTED MATTERS

A. Motion by Counsel Financial II LLC, LIG Capital LLC, and Counsel Financial Holdings LLC, to Convert this Chapter 11 Reorganization to a Chapter 7 Liquidation **[19-10747 ECF No. 249]**

1. **Related Documents:**

- (i) Declaration of David H. Wander, Esq. in Support of Motion by Counsel Financial II LLC, LIG Capital LLC, and Counsel Financial Holdings LLC, Pursuant to Section 1112(b) of the Bankruptcy Code, to Convert this Chapter 11 Reorganization to a Chapter 7 Liquidation **[19-10747 ECF No. 250]**
- (ii) Objection by Debtor Jeffrey Lew Liddle to Motion by Counsel Financial II LLC, LIG Capital LLC, and Counsel Financial Holdings LLC Pursuant to § 1112(b) of the Bankruptcy Code, to Convert This Chapter 11 Reorganization to a Chapter 7 Liquidation **[19-10747 ECF No. 263]**
 - i. Affidavit of Jeffrey Lew Liddle in Opposition to the Conversion Motions **[19-10747 ECF No. 263-1]**
 - ii. Declaration of Allen Willen in Support of Omnibus Objection by Debtor Liddle & Robinson, L.L.P. and Objection by Debtor Jeffrey Lew Liddle **[19-10747 ECF No. 263-2]**
- (iii) Reply by Counsel Financial II LLC, LIG Capital LLC, and Counsel Financial Holdings LLC in Further Support of Their Motions to Convert Debtors' Chapter 11 Reorganizations to Chapter 7 Liquidations **[19-10747 ECF No. 271]**
 - i. Declaration of David H. Wander in Further Support of Motion by Counsel Financial II LLC, LIG Capital LLC, and Counsel Financial Holdings LLC Pursuant to § 1121(b) of the Bankruptcy Code, to Convert this Chapter 11 Reorganization to a Chapter 7 Liquidation **[19-10747 ECF No. 272]**
 - ii. Declaration of Megan Payne in Further Support of Motions by Counsel Financial II LLC, LIG Capital LLC, and Counsel Financial Holdings LLC Pursuant to § 1121(b) of the Bankruptcy Code, to Convert these Chapter 11 Reorganizations to Chapter 7 Liquidations **[19-10747 ECF No. 273]**

- iii. Declaration of Richard Silverstein in Connection with Motions by Counsel Financial Entities to Convert Debtors' Chapter 11 Reorganizations to Chapter 7 Liquidations **[19-10747 ECF No. 274]**
- iv. Declaration of Ronald J. Soluri, Jr., CPA in Further Support of Motions by Counsel Financial II LLC, LIG Capital LLC, and Counsel Financial Holdings LLC Pursuant to § 1121(b) of the Bankruptcy Code, to Convert these Chapter 11 Reorganizations to Chapter 7 Liquidations **[19-10747 ECF No. 275]**
- v. Declaration of Glenn Philips in Further Support of Motion by Counsel Financial II LLC, LIG Capital LLC, and Counsel Financial Holdings LLC Pursuant to § 1121(b) of the Bankruptcy Code, to Convert this Chapter 11 Reorganization to a Chapter 7 Liquidation **[19-10747 ECF No. 276]**
- vi. Declaration of Larry Hatcher in Further Support of Motion by Counsel Financial II LLC, LIG Capital LLC, and Counsel Financial Holdings LLC Pursuant to § 1121(b) of the Bankruptcy Code, to Convert these Chapter 11 Reorganizations to Chapter 7 Liquidations **[19-10747 ECF No. 277]**

2. Status: Going forward with respect to Jeffrey Lew Liddle

B. First Application of EisnerAmper LLP for Interim Allowance of Compensation for Services Rendered and Reimbursement of Expenses Incurred as Accountants to the Debtor and Debtor-in-Possession for the Period from April 26, 2019 through October 31, 2019 **[19-10747 ECF No. 255]**

1. Related Documents:

- (i) Notice of Monthly Statement of EisnerAmper LLP for Compensation for Services Rendered and Reimbursement of Expenses Incurred as Accountants to the Debtor and Debtor-in-Possession for the Period from April 26, 2019 through May 31, 2019 **[19-10747 ECF No. 189]**
- (ii) Notice of Monthly Statement of EisnerAmper LLP for Compensation for Services Rendered and Reimbursement of Expenses Incurred as Accountants to the Debtor and Debtor-in-Possession for the Period from June 1, 2019 through June 30, 2019 **[19-10747 ECF No. 190]**

- (iii) Notice of Monthly Statement of EisnerAmper LLP for Compensation for Services Rendered and Reimbursement of Expenses Incurred as Accountants to the Debtor and Debtor-in-Possession for the Period from July 1, 2019 through July 31, 2019 **[19-10747 ECF No. 191]**
- (iv) Notice of Monthly Statement of EisnerAmper LLP for Compensation for Services Rendered and Reimbursement of Expenses Incurred as Accountants to the Debtor and Debtor-in-Possession for the Period from August 1, 2019 through August 31, 2019 **[19-10747 ECF No. 192]**
- (v) Notice of Monthly Statement of EisnerAmper LLP for Compensation for Services Rendered and Reimbursement of Expenses Incurred as Accountants to the Debtor and Debtor-in-Possession for the Period from September 1, 2019 through September 30, 2019 **[19-10747 ECF No. 215]**
- (vi) Notice of Monthly Statement of EisnerAmper LLP for Compensation for services rendered and reimbursement of expenses incurred as accountants to the Debtor and Debtor in Possession for the period from October 1, 2019 through October 31, 2019 **[19-10747 ECF No. 239]**
- (vii) Objection by Counsel Financial Holdings, LLC, Counsel Financial II, LLC, and LIG Capital, LLC to Notice of Monthly Statement of EisnerAmper LLP for Compensation for services rendered and reimbursement of expenses incurred as accountants to the Debtor and Debtor in Possession for the Period from October 1, 2019 through October 31, 2019 **[19-10747 ECF No. 253]**
- (viii) Objection by Counsel Financial Holdings, LLC, Counsel Financial II, LLC, and LIG Capital, LLC to First Application of EisnerAmper LLP **[19-10747 ECF No. 262]**

2. **Status:** Going forward with respect to Jeffrey Lew Liddle

C. Application for Final Professional Compensation of Torys LLP as Counsel to the Debtor and Debtor-in-Possession for the Period from April 1, 2019 through April 26, 2019 **[19-10747 ECF No. 228]**

1. **Related Documents:**

- (i) Objection by Counsel Financial Holdings, LLC, Counsel Financial II, LLC, and LIG Capital, LLC to Final Application of Torys LLP **[19-10747 ECF No. 238]**

- (ii) Reply in Support of Final Application of Torys LLP as Counsel to the Debtor for Services Rendered and Reimbursement of Expense Incurred for the Period from April 1, 2019 through April 26, 2019 [19-10747 ECF No. 269]

2. Status: Going forward with respect to Jeffrey Lew Liddle

D. First Application of Foley Hoag LLP for Interim Allowance of Compensation for Services Rendered and Reimbursement of Expenses Incurred as Counsel to the Debtor and Debtor-in-Possession for the Period from April 27, 2019 through October 31, 2019 [19-10747 ECF No. 254]

1. Related Documents:

- (i) Notice of Monthly Statement of Foley Hoag LLP for Compensation for Services Rendered and Reimbursement of Expenses Incurred as Counsel to the Debtor and Debtor in Possession for the Period from April 27, 2019 Through May 31, 2019 [19-10747 ECF No. 222]
- (ii) Notice of Monthly Statement of Foley Hoag LLP for Compensation for Services Rendered and Reimbursement of Expenses Incurred as Counsel to the Debtor and Debtor in Possession for the Period from June 1, 2019 Through June 30, 2019 [19-10747 ECF No. 223]
- (iii) Notice of Monthly Statement of Foley Hoag LLP for Compensation for Services Rendered and Reimbursement of Expenses Incurred as Counsel to the Debtor and Debtor in Possession for the Period from July 1, 2019 Through July 31, 2019 [19-10747 ECF No. 224]
- (iv) Notice of Monthly Statement of Foley Hoag LLP for Compensation for Services Rendered and Reimbursement of Expenses Incurred as Counsel to the Debtor and Debtor in Possession for the Period from August 1, 2019 Through August 31, 2019 [19-10747 ECF No. 225]
- (v) Notice of Monthly Statement of Foley Hoag LLP for Compensation for Services Rendered and Reimbursement of Expenses Incurred as Counsel to the Debtor and Debtor-in-Possession for the Period September 1, 2019 through September 30, 2019 [19-10747 ECF No. 242]
- (vi) Notice of Monthly Statement of Foley Hoag LLP for Compensation for Services Rendered and Reimbursement of Expenses Incurred as Counsel to the Debtor and Debtor-in-Possession for the Period October 1, 2019 through October 31, 2019 [19-10747 ECF No. 243]

- (vii) Objection by Counsel Financial Holdings, LLC, Counsel Financial II, LLC, and LIG Capital, LLC to Notices of Monthly Statements [19-10747 ECF No. 235]
- (viii) Objection by Counsel Financial Holdings, LLC, Counsel Financial II, LLC, and LIG Capital, LLC to First Application of Foley Hoag LLP for Interim Allowance of Compensation as Counsel to the Debtor [19-10747 ECF No. 262]

2. Status: Going forward with respect to Jeffrey Lew Liddle

E. Motion By Blaine H. Bortnick Pursuant to Rule 2004 and Section 105(a) of the Bankruptcy Code, for an Order Directing Jeffrey L. Liddle and Liddle & Robinson L.L.P. to Produce Documents and for Related Relief [19-10747 ECF No. 237]

1. Related Documents:

- (i) Objection by Debtor Liddle & Robinson, L.L.P. to Motion By Blaine H. Bortnick Pursuant to Rule 2004 and Section 105(a) of the Bankruptcy Code, for an Order Directing Jeffrey L. Liddle and Liddle & Robinson L.L.P. to Produce Documents and for Related Relief [19-10747 ECF No. 238]

2. Status: Going forward with respect to Jeffrey Lew Liddle

IV. DEBTOR LIDDLE & ROBINSON, L.L.P'S ADJOURNED ITEMS

A. Motion by Creditor Michael Barr to Lift Automatic Stay [19-12346 ECF No. 54]

1. Related Documents:

- (i) Affirmation in Support of Motion of Michael Barr for Entry of and Order Lifting the Automatic Stay [19-12346ECF No. 55]
- (ii) Notice of Adjournment of Hearing to Consider the Motion to Lift Automatic Stay by Creditor Michael Barr [19-12346 ECF No. 86]
- (iii) Notice of Adjournment of Hearing to Consider the Motion to Lift Automatic Stay by Creditor Michael Barr [19-12346 ECF No. 122]
- (iv) Notice of Adjournment of Hearing to Consider the Motion to Lift Automatic Stay by Creditor Michael Barr [19-12346 ECF No. 159]

2. Status: Motion has been adjourned by consent of all parties until the February 20, 2020 omnibus hearing.

V. DEBTOR JEFFREY LEW LIDDLE'S ADJOURNED ITEMS

- A. VW Credit, Inc.'s Motion for Relief from Automatic Stay Pursuant to 11 U.S.C. Section 362(d)(1) & (2) [**19-10747 ECF No. 77**]
 1. **Status:** Motion has been adjourned by consent of all parties until the February 20, 2020 omnibus hearing.
- B. Motion by M&T Bank for Relief from Stay re: 560 Main Street, Southampton Town, NY 11978 [**19-10747 ECF No. 107**]
 1. **Related Documents:**
 - (i) Memorandum of Law in Support of Motion for Relief from Stay re: 560 Main Street, Southampton Town, NY 11978 [**19-10747 ECF No. 108**]
 2. **Status:** Motion has been adjourned by consent of all parties until the February 20, 2020 omnibus hearing.
- C. Motion by Creditor Michael Barr to Lift Automatic Stay [**19-10747 ECF No. 168**]
 1. **Related Documents:**
 - (i) Affirmation in Support of Motion of Michael Barr for Entry of and Order Lifting the Automatic Stay [**19-10747 ECF No. 169**]
 - (ii) Notice of Adjournment of Hearing to Consider the Motion to Lift Automatic Stay by Creditor Michael Barr [**19-10747 ECF No. 193**]
 - (iii) Notice of Adjournment of Hearing to Consider the Motion to Lift Automatic Stay by Creditor Michael Barr [**19-10747 ECF No. 230**]
 - (iv) Notice of Adjournment of Hearing to Consider the Motion to Lift Automatic Stay by Creditor Michael Barr [**19-10747 ECF No. 260**]
 2. **Status:** Motion has been adjourned by consent of all parties until the February 20, 2020 omnibus hearing.

Dated: December 17, 2019
New York, New York

Respectfully submitted,

/s/ Alison D. Bauer
FOLEY HOAG LLP
Alison D. Bauer
William F. Gray, Jr.
Jiun-Wen Bob Teoh
1301 Avenue of the Americas
25th Floor
New York, New York 10019
abauer@foleyhoag.com
wgray@foleyhoag.com
jteoh@foleyhoag.com
Tel: 646.927.5500
Fax: 646.927.5599

Michael Licker
Meredith S. Parkinson
James Fullmer
FOLEY HOAG LLP
Seaport West
155 Seaport Boulevard
Boston, Massachusetts 02210
mlicker@foleyhoag.com
mparkinson@foleyhoag.com
jfullmer@foleyhoag.com
Tel: 617.832.1197
Fax: 617.832.7000

*Attorneys for Jeffrey Lew Liddle
and Liddle & Robinson LLP,
each a Debtor and Debtor-in-Possession*